



Mayor, Council,

The following was provided to the Iowa Department of Transportation in reference to the City of Oelwein maintaining their Automatic Traffic Enforcement:

Thank you for your email. While we're pleased to hear that IDOT is reviewing Oelwein's appeal, as indicated in our appeal documents, it remains the City's position that IDOT lacks the discretion to deny permits to existing systems once valid submissions are provided consistent with Division II, Section 10 of Chapter 321P of the Iowa Code. The City provided valid submissions consistent with Iowa Code section 321P.2(a) – (g) on or before July 1, 2024, and never received any indication that its submissions were not valid. As such, Oelwein should have been issued operating permits as an existing system.

The City does not believe that additional information is required by the Iowa Code and the City strongly urges IDOT to apply the plain language of Chapter 321P and treat the City's ATE system as an existing system as compared to a new system post-2024. Applying the discretionary "critical traffic safety issues" standard as laid out in section 321P.1 as if the City was applying for a new system is directly contrary to the mandatory language of Division II, Section 10 of Chapter 321P. The Iowa Legislature treated the two systems different so it would be inappropriate to treat them the same for the purposes of appeal.

Without waiving any arguments in our appeal, we do feel that providing you with a representative sample of the issues we are facing in the areas of our ATE systems, will further shed some light on why the City has made the decision to place the ATE's at the designated locations. In addition to the information provided in our June 2024 application and again in our appeal, the following data demonstrates the need and urgency for the automated traffic enforcement systems in Oelwein. While the apparent standard for consideration, for new systems, is traffic accidents resulting in serious injury or death, we maintain the position that violations cause accidents. The more violations, the more at risk our public is for a serious accident.

We have researched the period of November 1, 2024, to April 30, 2025, to where the systems were tracking data, but not enforcing violations. During this six-month period, the systems detected 20,192 violations at 11 mph or more over the speed limit. A breakdown of those numbers reflects 19,209 violations for speed violations at the 11 mph to 20 mph range. Further, 615 of those violations were in the 21 mph to 25 mph threshold, 155 of which were in the 26 mph to 30 mph threshold, and an astounding 213 violations for at or above 31 mph over the speed limit.

For comparison, we researched the same 6-month period one year prior (November 1, 2023, to April 30, 2025) to where the ATE systems were on and enforcing traffic violations. During this six-month period, the systems detected 4,368 violations at 11 mph or more over the speed limit. A breakdown of those numbers reflects 3,931 violations for speed violations at the 11 mph to 20 mph range. Further, 186 of those violations were in the 21 mph to 25 mph threshold, 63 of which were in the 26 mph to 30 mph threshold, and 188 violations for at or above 31 mph over the speed limit.

This data reflects that when the ATE system was in place and enforcement was utilized, the public's behavior was positively impacted by significantly reducing the violations and therefore the potential for a serious accident. When the public was aware that the systems were not enforcing violations, behavior devolved to serious traffic infractions with a 362.8% increase in overall violations. The highest number of violations are coming from the area in which the IDOT listed the Oelwein ATE system as not necessary, which is East Line Road. While the City respects the position that the IDOT has been placed in, the City believes that painting all communities with the same brush is not an equitable way to determine the need for these safety systems. These decisions should be left for local control as the elected officials have researched and are responding to community needs.

We also recognize that enforcement efforts are held to a least restrictive means standard. As the data reflects, the violation counts are significant. The community of Oelwein has a high call for service count with an officer allotment below national and state standards. To exasperate this issue, due to recent property tax cuts, our community will be losing an officer position. In a recent survey, our police department responds to calls for service that rank in levels of communities 1.5 time our size and departments that have an officer allotment of 3 to 4 more officers than Oelwein. With officers time being demanded in so many areas, an expectation of intense officer traffic enforcement is not feasible.

For the reasons stated in our June 2024 application, for the reasons stated in our appeal, and for the reasons stated above, the City of Oelwein hereby requests approval of all ATE systems that have been previously requested and that were in place prior to January 1, 2024. If you wish to receive further details or specific breakdowns of data by location, please feel free to reach out.